

# **Liberty Union High School District (LUHSD)**

## **Respiratory Protection Plan (RPP) for COVID-19**

### **1.0 PURPOSE**

LUHSD is committed to promoting the safety and welfare of students and employees. The RPP was developed to provide guidance for selected employees who will be in use of respiratory protective devices, such as disposable N95 masks, to prevent contracting COVID-19. This guidance has been developed in accordance with California Code of Regulations (CCR), Title 8, Article 4, Subchapter 4 and Section 531.

### **2.0 OVERVIEW OF RESPIRATORY PROTECTION PROGRAM**

The RPP is coordinated by the **LUHSD School Nurse and the Assistant Superintendent of Administrative/Student Services**. The School Nurse and Assistant Superintendent will review work areas in each district school/program to identify hazards that may warrant the use of respiratory equipment. The purpose of this review is to identify the nature of potential hazards, employees that may be exposed, and control measures to protect employees from COVID-19.

As hazards are identified, efforts shall be focused on identifying and developing engineering control measures to reduce exposure so that respiratory equipment will not be necessary. Where this is not possible and in emergency situations, respiratory equipment may be required.

LUHSD has purchased and procured respirators approved by the National Institute for Occupational Safety. Selection of employees assigned shall be based on the specific nature and magnitude of the hazard. Employees shall be provided training in the proper selection, use, and care of the particular respiratory equipment that they may be required to wear. Before an employee is assigned equipment, a qualitative fit test must be performed by a Board of Education approved outside agency to assure that the equipment fits properly and is in accordance with the California Division of Occupational Safety and Health (Cal/OSHA). **A respirator will be effective only if it fits properly.**

Employees are expected to care for equipment assigned to them and to inspect it before each use. This RPP shall be periodically evaluated by the **LUHSD School Nurse and Assistant Superintendent, Administrative/Student Services** to assure that employees are provided necessary equipment and training, and the program complies with state and federal regulations.

### **3.0 RESPONSIBILITIES**

#### **3.1 Employees**

Employees shall:

- a) Know how to properly select, care for, and use respiratory equipment necessary for their work;
- b) Inspect and maintain the equipment they use;
- c) Successfully complete respiratory protection and other required training where necessary; and
- d) Inform their administrator/supervisor of personal changes potentially influencing the respirator fit.

#### **3.2 LUHSD School Nurse and Assistant Superintendent, Administrative/Student Services (with the support of supervising Administrators/Supervisors) shall:**

- a) Assign respirators to select employees based on the nature of his/her assignment level of risk pertaining to COVID-19;
- b) Ensure that employees know how to properly select, use, and care for respiratory equipment needed for their work;
- c) Provide access to medical evaluations for employees required to use respirators;
- d) Periodically survey work areas and procedures requiring respiratory equipment no less than once per year;
- e) Procure necessary respiratory equipment;

- f) Coordinate attendance of employee training sessions;
- g) Maintain files of inspection results, training, fit test results, and other pertinent information; and
- h) Coordinate and evaluate contract with appropriate external agency work for respiratory protection needs.
- i) Develop LUHSD respiratory protection guidelines for routine and reasonably foreseeable emergency;
- j) Know how to properly select, use and care for respiratory equipment;
- k) Advise employees and departments on equipment selection and purchase;
- l) Inspect work areas and appropriate procedures where respiratory equipment is used to assure proper selection and use;
- m) Ensure adequate air quality, quantity and flow of breathing air for atmosphere-supplying respirators;
- n) Permit employees to use their own respirators if such respirator use will not in itself create a hazard;
- o) Provide the respirator users with the "Respiratory Protection in the Workplace" ([https://www.dir.ca.gov/dosh/dosh\\_publications/respiratory.pdf](https://www.dir.ca.gov/dosh/dosh_publications/respiratory.pdf));
- p) Ensure that any employee using a respirator voluntarily is medically able to use that respirator;
- q) Evaluate the respiratory protection program annually; and
- r) Assist in providing respiratory protection training and fit-testing for tight-fitting respirators.

#### **4.0 RESPIRATORY EQUIPMENT SELECTION**

The primary reason for a respiratory protection program is to maintain employee health. Therefore, using proper respiratory equipment for the task is imperative. Selection of a respirator shall be based on the specific activity or the nursing procedure the individual is performing. Respiratory protection equipment shall be chosen and assigned for specific activities or nursing procedures upon the assurance that the respirator and cartridge are appropriate for COVID-19.

##### **Certification**

All respirators must be certified by the National Institute for Occupational Safety and Health (NIOSH) and shall be used in accordance with the terms of that certification. Also, all filters, cartridges, and canisters must be labeled with the appropriate NIOSH approval label. The label must not be removed or defaced while it is in use.

#### **5.0 MEDICAL EVALUATION**

The use of any type of respirator may impose some physiological stress on the user. Federal regulations require that all potential users are required to have a medical evaluation to determine the employee's ability to use a respirator; before the employee is fit tested or required to use the respirator in the workplace.

The district will contract out with an authorized third-party agency. The contracted agency will conduct the medical evaluations in accordance with the California Department of Industrial Relations regulations.

#### **6.0 FIT TESTING**

Qualitative fit testing shall be performed for each employee and for each respirator the employee may wear. The employee must be fit tested (prior to initial use of the respirator) with the same make, model, style, and size of respirator that will be used and at least annually thereafter. Fit testing shall be performed by a person designated by the Assistant Superintendent, Administrative/Student Services, and shall follow the procedures outlined later in this section. Testing shall occur before a respirator is assigned. Self-tests shall be performed by the employee in accordance with this section each time before

a respirator is worn. Anything that may compromise the seal of the face piece may render the respirator useless. For this reason, persons with facial characteristics that prevent a good seal must either be provided a positive pressure respirator with a hood or helmet or be prohibited from work requiring a respirator.

In cases where employees voluntarily maintain characteristics that interfere with the face seal, the district shall determine whether to provide suitable protection or to keep the employee out of the worksite. Employees that wear eyeglasses or contact lenses shall be provided with eyeglass inserts designed to fit within a full face mask when required.

### **6.1 Self-Fit Test Procedures**

Employees shall check the fit of their respirators before each use according to the procedures outlined below. **The District School Nurse** shall train employees in these procedures during qualitative fit testing sessions.

#### **6.1.1 Negative Pressure Test**

The user closes the inlet of the cartridge or filters by covering them with the hands or squeezing the breathing tube so air is not allowed to pass. The user inhales gently so the face piece collapses slightly, while breath is held for about 10 seconds. If the face piece remains slightly collapsed and no inward leakage is detected, the respirator probably has a good fit. This test should only be used for snug-fitting respirators. It also has potential drawbacks such as hand pressure affecting the face piece seal and causing false results.

#### **6.1.2 Positive Pressure Test**

The user closes or covers the exhalation valve and gently exhales into the face piece. The respirator fit is considered acceptable if slight positive pressure can be built up inside the face piece without any evidence of outward leakage on the outside. For some respirators, this test requires that the wearer remove the exhalation valve cover. This removal often disturbs the respirator fit if not done before the respirator is put on. The test is simple for respirators that have a valve cover with a single small port that can be covered with the hand or a finger.

## **7.0 RESPIRATOR USE**

Employees are responsible for:

- a) Using their respirators under conditions specified by this program, and according to the training they receive on the use of each particular model.
- b) Not using the respirator in a manner for which it is not certified by NIOSH or by its manufacturer.
- c) Conducting user seal checks each time that they wear their respirator.
- d) Using either the positive or negative pressure check (depending on which test works best for them) specified in Appendix B-1 of the Respiratory Protection standard.
- e) Leaving the work area to reevaluate the continued effectiveness of the respirator for the following reasons:
  - i. To wash their faces and respirator face pieces if necessary to prevent eye or skin irritation associated with respirator use;
  - ii. If they detect vapor or gas breakthrough, changes in breathing resistance, or leakage of the face piece; (if this happens, the respirator must be replaced or repaired before allowing the employee to return to the work area);
    - to change filters or cartridges, or replace parts; or
    - to inspect the respirator if it stops functioning as intended.
- f) Notifying their supervisor before leaving the area.
- g) Not wearing tight-fitting respirators if they have any condition, such as facial scars, facial hair, or missing dentures, that prevents them from achieving a good seal.
- h) Not wearing headphones, jewelry, or other articles that may interfere with the face piece-to-

face seal.

## **8.0 MAINTENANCE AND CARE OF RESPIRATORS**

### **8.1 Cleaning and Disinfecting**

Respirators provided are clean, sanitary and in good working order.

Respirators are cleaned and disinfected using the procedures specified in Appendix B-2 of the Respiratory Protection Standard.

### **8.2 Storage**

When not in use, respiratory equipment shall be sealed and stored per the manufacturer's instructions. The respirator should be stored with nothing lying on top of it. Each employee is responsible for their respirator. Respirators shall be stored in a location protected against dust, sunlight, extreme heat, and cold, excessive moisture, or damaging chemicals, fumes, or vapors.

## **9.0 INSPECTION**

Users shall inspect their respirators for defects and elasticity before and after each use.

## **10.0 EMERGENCY USE EQUIPMENT**

N/A for Respiratory Protection Program for COVID-19.

## **11.0 TRAINING and INFORMATION**

All employees using respiratory equipment shall successfully complete the training identified in this section prior to use a respirator. Lack of the employee's knowledge or use of the respirator indicates that the employee has not retained the required understanding or skill. In addition, training must also be successfully completed as necessary for confined space work, emergency response, or other regulated activity.

Employee training should be conducted annually and more often if necessary.

The employee shall demonstrate knowledge of at least the following:

1. Why the respirator is necessary and how improper fit, usage, or maintenance can compromise the protective effect of the respirator;
2. What the limitations and capabilities of the respirator are;
3. How to use the respirator effectively in emergency situations, including situations in which the respirator malfunctions;
4. How to inspect, put on and remove, use, and check the seals of the respirator;
5. What the procedures are for maintenance and storage of the respirator;
6. How to recognize medical signs and symptoms that may limit or prevent the effective use of respirators

## **12.0 PROGRAM EVALUATION**

The respiratory protection program shall be reviewed annually. Corrections, additions, or deletions which will improve the program shall be made. If changes are realized or needed at any other time, they can be adopted then as well as during the review. Respirator fit, appropriate respirator selection, proper respirator use, and maintenance are some of the factors that shall be assessed during the evaluation.

## **13.0 RECORDKEEPING**

Written information regarding medical evaluations, fit testing, and the respirator program shall be kept on file. Fit testing results, as discussed in Section 8.1, shall be kept on file for a minimum of **[two (2) years]**.

**Resources:**

CAL/OSHA Respiratory Protection Fact Sheet:

[https://www.dir.ca.gov/dosh/dosh\\_publications/respiratory-protection-fs.pdf](https://www.dir.ca.gov/dosh/dosh_publications/respiratory-protection-fs.pdf)

OSHA Fit testing of Respirators <https://www.youtube.com/watch?v=D38BjgUdL5U>

OSHA Respirator Safety: <https://www.youtube.com/watch?v=Tzpz5fko-fg>

OSHA the Difference between Respirators and Surgical Masks:

<https://www.youtube.com/watch?v=ovSLAuY8ib8&t=26s>

OSHA Respiratory Protection for Healthcare Employees Training Video:

<https://www.youtube.com/watch?v=6qkXV4kmp7c&t=100s>